

# SCHLACK ITO LOCKWOOD PIPER & ELKIND

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The Honorable Chairman and Members  
State of Hawaii Public Utilities Commission  
465 South King Street, Room 103  
Kekuanaoa Building  
Honolulu, HI 96813

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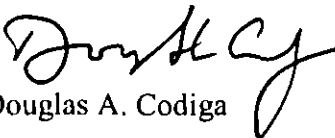
Re: Docket No. 2009-0108: Integrated Resource Planning Docket  
Preliminary Statement of Position

Honorable Chairman and Members of the Commission:

Pursuant to the Commission's Order Approving the Stipulated Procedural Order, as Modified, filed September 23, 2009, Blue Planet Foundation ("Blue Planet") timely submitted its Preliminary Statement of Position on October 2, 2009. It was thereafter brought to our attention that page 9 was inadvertently omitted from this document. Accordingly, Blue Planet respectfully submits the enclosed page 9 for reference and incorporation into its Preliminary Statement of Position. Blue Planet sincerely regrets any inconvenience to the Commission or parties in this proceeding.

Very truly yours,

SCHLACK ITO LOCKWOOD PIPER & ELKIND  
A LIMITED LIABILITY LAW COMPANY

  
Douglas A. Codiga

DAC:kmc  
cc: Service List

measures; and (4) contingency planning regarding proposals for up to 400 MW of wind energy from Lanai and/or Molokai.

**E. The Framework Should Support Hawaii's Swift Transition to a Clean Energy Economy by Directly and Effectively Contributing Toward the Achievement of Fundamental State Energy Objectives.**

To be successful, any integrated resource planning framework adopted in this proceeding must directly and effectively contribute toward achievement of fundamental Hawaii energy objectives. As noted above, a primary state energy objective is the achievement of seventy percent clean energy by 2030.<sup>16</sup> Act 155 requires that Hawaii achieve "a seventy percent clean energy economy within a generation."<sup>17</sup> To accomplish this, forty percent of net electricity sales by electric utility companies in Hawaii shall be from renewable electrical energy, and energy efficiency measures shall cause the equivalent of a thirty percent reduction in energy use.<sup>18</sup> Accordingly, under Part V of Chapter 269, Hawaii Revised Statutes, the utilities are required to acquire specific percentages of electrical energy from renewable energy and energy efficiency, or Renewable Portfolio Standards ("RPS"). Section 269-92(b), as amended by Act 155, requires each utility to establish an RPS of forty percent of its net electricity sales by 2030.<sup>19</sup> Section 11 of Act 155 requires the establishment of Energy Efficiency Portfolio Standards ("EEPS") capable of securing 4,300 gigawatt hours of electricity use reductions statewide by 2030. It should be noted that Hawaii law also requires statewide reduction of greenhouse gas emissions to 1990 levels by the year 2020,<sup>20</sup> and the Hawaii Legislature has

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<sup>16</sup> 2009 Haw. Sess. Laws, Act 155 §§ 3, 11.

<sup>17</sup> 2009 Haw. Sess. Laws, Act 155 § 1.

<sup>18</sup> *Id.* at §§ 3, 11; *see also* Hawaii Powered: Hawaii Clean Energy Initiative (Energy efficiency measures implemented over the next two decades can save 4,300 gigawatt hours of electricity, equivalent to approximately thirty percent of the demand forecasted for 2030), *available at* [http://www.hawaiicleanenergyinitiative.org/wg\\_efficiency.html](http://www.hawaiicleanenergyinitiative.org/wg_efficiency.html).

<sup>19</sup> 2009 Haw. Sess. Laws, Act 155 § 2.

<sup>20</sup> Haw. Rev. Stat. § 342B-71.